

How to Coordinate Federal Programs and Submit One Program Evaluation



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Outcomes for Participants

- Understand the intent and purpose of each of the supplemental funds that support English learners.
- Become familiar with rules for coordinating federal funds.
- Acquire creative and effective ways for coordinating local, state and federal funds.
- Explore how to use ONE MDE Program Evaluation Tool to evaluate an initiative/program/strategy.

Program Intent & Purpose

- Title I, Part A: Help academically at-risk students to attain the knowledge and skills necessary to meet State academic achievement standards.
- Title I part C: Ensure migratory children meet state academic content standards; overcome educational disruption, cultural/ language barriers, social isolation, various health-related problems, and to help them make a successful transition.
- Section 31a: Provide instructional and direct non-instructional support services for pupils to achieve reading proficiency by the end of third grade and college and career readiness in 11th grade.

Program Intent & Purpose

- Title II: Help schools and districts improve teacher and principal quality and ensure all teachers are highly qualified. Activities include teacher preparation, recruitment and hiring, induction, professional development, teacher retention, or effective school leadership.
- Title III, Part A: Help limited English proficient students to attain English language proficiency, acquire knowledge and skills necessary to meet State academic achievement standards **(AMAOs)**; provide evidence-based instructional programs and ensure highly qualified teachers.

Other Federal Laws

- **Title VI** of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin.
- Under Title VI, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies.”
- OCR requires providing an Alternative Language Program for ELs to ensure equitable access to the state content standards.

Criteria For Using Federal Funds

Reasonable- A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Allocable- A cost is allocable to a cost objective if the goods or services involved are chargeable or assignable to the cost objective in accordance with the relative benefits received.

Allowable- A cost is allowable if it is necessary and reasonable for proper and efficient performance of the award and allocable to the award. **(OMB Circular A-87)**

Supplement, not Supplant

Title III; Part A; Title I, Part A; Title I, Part C as well as Title II have supplement, not supplant requirements:

- Title I, Part A: funds must supplement, and not supplant non-Federal funds. [Section 1120A(b) of the ESEA]
- Title III, Part A: funds must supplement, and not supplant services provided in the prior year or other Federal, State, and local funds. [Section 3115 of the ESEA]
- Title I, Part C: Sub-grantees must comply with the supplement, not supplant provisions [Section 1120A(b) of ESEA]

Layers of Education & Supports for ELL

- 1st - Basic, local board adopted curriculum that all students receive.
- 2nd - OCR mandated alternative language program that provides students English language instruction and meaningful access to the core curriculum (1st layer)
- 3rd - Supplemental support from Title I and Section 31a
- 4th - ALTERNATIVE Title III supplemental services beyond 1st & 2nd layers: must include additional direct instruction that helps close the achievement gap, professional development, and parent outreach.

Layers of Education & Supports for ELL

4th – ALTERNATIVE Title III **supplemental** services beyond the 1st & 2nd layers: must include additional direct instruction that helps close the achievement gap, professional development, and parent outreach

3rd – Supplemental support from Title I and 31Aa

LEA General Fund
Responsibility

2nd – OCR mandated alternative language program that provides students English language instruction and meaningful access to the core curriculum (1st layer)

1st – Basic, local board adopted curriculum that all students receive.

Intent and purpose: Professional Development

Title III Sec. 3111

- Aligned with the Title III Plan included within the district's continuous improvement plan (DIP, SBDIP).
- Focused on language and content instruction
- Provided **Only** for teachers, paraprofessionals, parents, community members of ELs.
- Is systemic, systematic and job embedded
- The plan is evaluated annually following the Title III indicators; If in coordination with other initiatives use MDE's Program Evaluation Tool (PET).

Title I, Part C

- Aligned with the plan (DIP, SBDIP)
- Provided **Only** for staff of migrant students
- Evaluated annually following the indicators

Intent and Purpose: Professional Development

- Title I, Part A: focused on proficiency and basic core academic areas
- Aligned to the improvement plan
- Only for staff who work closely with targeted assistance students in a targeted building
- Can fund all staff in schoolwide as long as it is aligned with identified need in that building as referenced in the continuous improvement plan
- Can fund everyone in ***focus and priority*** Schools that are currently applying to become schoolwide.

Intent and Purpose: Professional Development

Title II:

- Aligned with the DIP/SBDIP.
- Focus on teacher, paraprofessional and administrators' quality/ leadership.
- Can fund everyone in both targeted assistance, schoolwide schools and non-Title I schools.

31a:

- Aligned to the DIP/SBDIP/SIP
- Ensures that 3rd graders are on grade level in reading; that 11th graders are career & college ready.
- Can fund all staff

Guiding Principles: Title I, Part A; Title III, Title I, Part C; Section 31a and Section 41

Hired staff must be:

- Supplemental to teachers of record
- Supervised (paraprofessionals at all times)
- Highly qualified (endorsed if for ELs) with ongoing research-based staff development.
- Work with identified eligible students.
- May not be assigned any administrative roles unless the position includes split responsibilities.

Intent & Purpose: Parent Involvement

Title I, Part A--Section 1118 of ESEA:

- Parent involvement policy
- Parent involvement plan
- Evaluate the plan annually
- Include parents in the development, revision implementation and evaluation of the plan
- Parent involvement activities are delivered in a language parents understand
- Develop and review a parent school compact outlining each stakeholder's responsibilities and help students achieve.

Intent & Purpose: Parent Involvement: Title III & Title I, Part C

- Focuses on parent involvement and engagement
- Parent involvement plan is guided by parental input and active participation
- Supplemental to, and well coordinated with, Title I Part A Policy and plan
- Aligned to students' academic objectives
- Parent involvement activities are delivered in a language parents understand
- Plan is evaluated annually
- No parent involvement rules for 31a or Title II.

Administrative & Indirect Costs

- Administrative costs are associated with overall project management and administration and are not directly related to the provision of services or otherwise allocable to program cost objectives/categories.
- Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, but are necessary for the general operation of the organization.
- Common administrative cost function codes are: 226,283,231-single audit, 261 building operational services, 281 central office program evaluation, and indirect cost.

Administrative cost

- Title III: LEAs have a limit of 2% of the Title III subgrant for administration. (section 3115(b)). The 2% administrative cap includes both administrative costs + indirect costs.
- Title I, part A: LEAs have a limit of 10% of the Title I subgrant for administration.
- Title II: administrative cost may not exceed 5%
- Title I, Part C: administrative cost may not exceed 15%
- Section 41 Bilingual Education and Section 31a 'at risk' do not allow any administrative cost.

Steps for Coordinating Spending Federal \$\$\$

1. Prioritize and identify the **comprehensive initiative** the school wants to implement that will have a positive **impact on student achievement**.

2. Identify the **component costs of the initiative**, determine which federal program is the best fit for funding based on its purpose and eligibility requirements.

3. Determine if **necessary, reasonable, allowable**

http://www.whitehouse.gov/omb/circulars_a087_2004#43

4. Ensure that the cost is **consistent with** the LEA's DIP/SIP/SBDIP **and** the consolidated application.

Let's Discuss!

Examples of well-coordinated initiatives



Example 1 : Intensive professional development on career & college ready standards.

Funding sources:

- Title I, Part A: Professional development on appropriate instructional strategies for struggling students, including reasonable related costs (stipends, substitute teachers, etc.).
- Title III, Part A: **Supplemental** professional development to staff, and other school and community-based organizational personnel on second language acquisition strategies.
- Title II: Resource teachers modeling best practices in reading or mathematics in classrooms.

Example 1 (cont'd) : Intensive professional development on career & college ready standards.

- Title I, Part C: Professional development addressing removing barriers to learning such as family relocation and culture-specific competencies.
- 31a: Professional development books on reading strategies for struggling adolescent readers.
- Section 41: Professional development for bilingual teachers on bi-literacy strategies.

Example 2: Instructional coaches to provide job-embedded professional development for teachers .

- Title I, Part A: Instructional coaches to assist teachers in delivering improved classroom instruction. Coaches may not work to effect class size reduction, as they model and provide examples for teachers
- Title II: Professional development on improving student behavior; identifying early and appropriate interventions to help students with special needs.
- Training on how to use data and assessments to improve classroom practice and student learning.
- Title III, Part A : ESL/bilingual coaches on teaching L2 oral language development strategies for English learners.
- Section 41: Staff development books on bi-literacy.

Example 3: Aligning instruction across grades throughout the school and responsive to student needs

- Title I, Part A: Hiring outside data experts to coach staff on how to read data, interpret results, identify gaps in achievement and determine interventions (schoolwide). In targeted assistance, only school personnel working closely with targeted assistance students can participate. Can include everyone in Focus and Priority Schools
- Title II: Professional development (learn how to) involving collaborative groups of teachers and administrators on how to use data and assessments to improve classroom practice and student learning. Entire staff can participate SW or TA; Can include non-Title I building staff.
- Title III: Vertical and horizontal alignment of supplemental curricula for English language learners designed to improve English proficiency and academic achievement.

Example 4: Improve Parent Involvement

- **Title I-A** – Hiring a districtwide bilingual parent educator (teacher position) to ensure systemic planning and delivery of parent engagement plan(s).
- **Title I-A** – Hire School level parent liaisons in a schoolwide school to support family literacy, parent discussions and education. In a TA-focus on parents of TA students
- **Title I-C** – District parent bilingual liaisons for migrant students to assist with transitions, cultural competence and community outreach for migrant families.
- **Title III LEP or Immigrant** – ESL teacher to provide second language acquisition course to parents of English learners.
- **Section 31a**- purchasing instructional materials to send home with eligible/identified students for reading improvement.

Examples of Coordinating Funds

AT YOUR TABLE

Draft one example of a well-coordinated initiative and how it can be funded by several funding sources (both state and federal funds).

Evaluating one of these initiatives/programs

- Districts are required to use the MDE Program Evaluation Tool and submit **one evaluation** of an initiative/program via the ASSIST by June 30, 2015.
- Coordination across programs is highly encouraged, cost effective and efficient (implementation).
- Continue implementing the Title III Indicators which address program evaluation (indicators # 22-50) to ensure AMAOs are being met.
- Evaluation means progress monitoring via benchmark/interim assessment and summative evaluation: Reviewing annual WIDA and state content assessments and identifying strengths/ challenges.

The MDE Program Evaluation

- The MDE Program Evaluation Tool is posted on the MDE website along with several resources including:
- The MDE Evaluation FAQ
- Program Evaluation Tool Chart
- Sample program evaluations : writing, extended day, academic language, mathematics, and parent engagement.

www.michigan.gov/ofs

Under “current topics”

Questions from the audience

